

Exhibit 2 to the Complaint – claim chart for Dogtra.

**Preliminary Infringement Contention
U.S. Patent No. US 9,261,365 v. Dogtra
Claim 1 (exemplary)**

Exhibit 2 to the Complaint – claim chart for Dogtra.

1. Claim Chart

Claim	Analysis
<p>[1.P] A method for receiving location information at a positional information device, the method comprising:</p>	<p>Dogtra (“Company”) performs and induces others to perform a method for receiving location information at a positional information device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides GPS collars including, but not limited to, Pathfinder2 TRX GPS collar (taken here as an exemplary product), Pathfinder2 Mini collar, and Pathfinder2 collar to be worn by a dog. Further, the collar is paired with a PathFinder application through a receiver device, PathFinder2 GPS connector. Furthermore, the application allows a dog trainer to access the dog’s location information (“receiving location information at a positional information device”) from their mobile device, where the application is installed. To receive the dog’s location data, the dog trainer needs to turn on the GPS on the mobile device and establish a connection with the receiver device.</p>

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GPS TRACKING & TRAINING COLLARS

The Dogtra PATHFINDER family of GPS tracking collars for hunting dogs is packed with features and industry leading accuracy that delivers modern technology directly to your smartphone. Our **GPS tracking collars for hunting dogs** currently come in three different models: PATHFINDER2, PATHFINDER2 TRX, and PATHFINDER MINI. These tracking collars & equipment allow hunters, professional handlers, and K-9 and military officers to track as many as 21 dogs with a range of up to 9 miles. Whether the trainer is running exercises, out in the field, or attending competitions, never has there been a more responsive, accurate, and convenient way to track and train dogs.

Source: <https://www.dogtra.com/products/tracking-and-training>

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	<div data-bbox="430 381 1155 771">A black Dogtra Pathfinder TRX collar with an orange strap and a black receiver unit. The receiver unit has a small green LED light and the Dogtra logo.</div> <div data-bbox="1186 324 1879 397">PATHFINDER TRX ADDITIONAL GPS-ONLY COLLAR</div> <div data-bbox="1186 402 1270 430">\$229.99</div> <div data-bbox="1186 454 1291 495">QTY <input type="text" value="1"/></div> <div data-bbox="1318 446 1507 495">ADD TO CART</div> <div data-bbox="1516 446 1831 495">FIND AUTHORIZED DEALERS</div> <div data-bbox="1318 506 1480 532">ADD TO WISH LIST</div> <div data-bbox="1186 555 1764 581">FREE SHIPPING IN THE CONTIGUOUS US ON ORDERS OVER \$199.99</div> <div data-bbox="1186 609 1449 633">RATING 4.7/5  3 REVIEWS</div> <div data-bbox="1186 662 1900 717">Approved for AKC, UKC, and PKC events, an additional GPS-Only Collar for the expandable PATHFINDER TRX tracking system. Available in colors Orange, Green, Black, and Blue.</div> <div data-bbox="1186 717 1407 743">Package includes: Charger</div> <div data-bbox="1186 747 1774 776">Please specify collar strap color in the comment section during checkout.</div> <div data-bbox="409 863 1627 906">Source: https://www.dogtra.com/products/dogtra-parts/pathfindertrx-additional-gpsonly-collar</div>
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Exhibit 2 to the Complaint – claim chart for Dogtra.



Source: <https://www.youtube.com/watch?v=ITeiCmJf5Do>, at 1:45

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3. PAIRING YOUR DEVICE

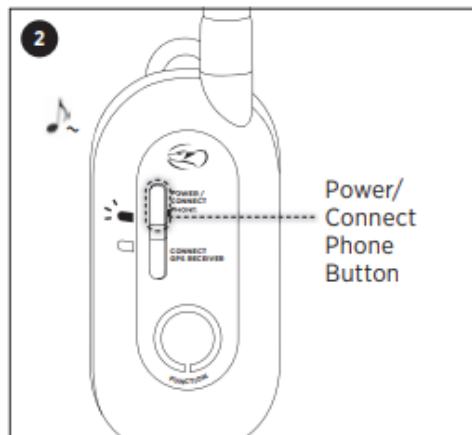
The PATHFINDER2 GPS connector connects a smartphone and receiver. These devices need to be paired for the system to work properly.

PAIRING THE GPS CONNECTOR TO A PHONE



Make sure the PATHFINDER2 app has been downloaded on your phone. Turn on Bluetooth on your phone and place the GPS connector next to your phone.

positional information device



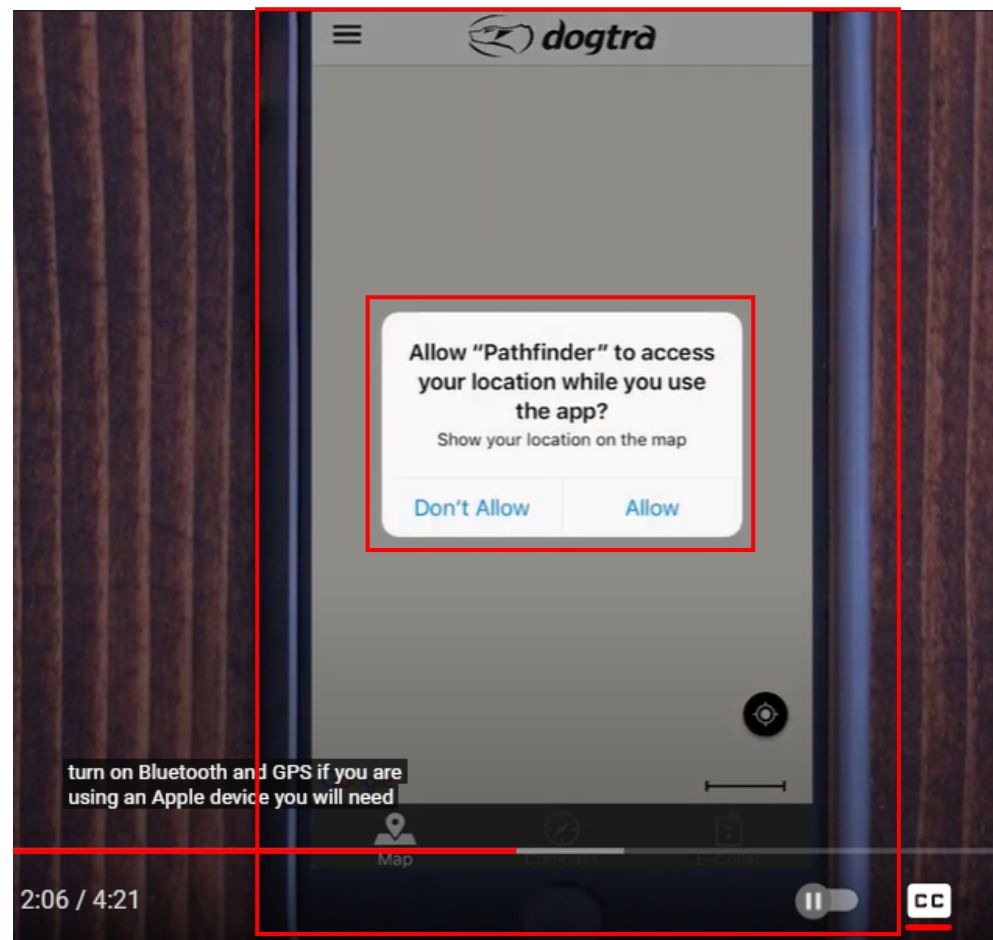
Make sure the GPS connector is off. Press and hold the Power/Connect Phone Button until a green LED light flashes and a melody plays to search for your phone.

Power/
Connect
Phone
Button

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Source:

https://www.dogtra.com/cache/DOC133_PATHFINDER2series_USA20230306REDUCED.pdf?20230308042711,
Page 9 (annotated)



Source: <https://www.youtube.com/watch?v=CpuTyeLsH8Q>, at 2:06

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receiving location
information

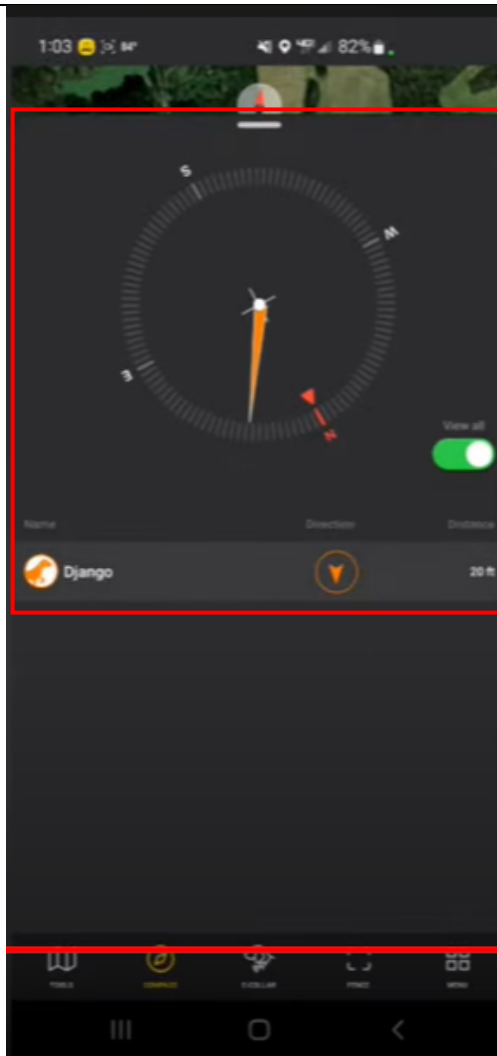
Source: <https://www.youtube.com/watch?v=ITeiCmJf5Do>, at 16:16 (annotated)

Further, to the extent this element is performed at least in part by Company's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

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<p>[1.1] sending a request from a requesting positional information device to a server for at least one address stored in at least one sending positional information device, the request including a first identifier of the requesting positional information device</p>	<p>Company performs and induces others to perform the step of sending a request from a requesting positional information device to a server for at least one address stored in at least one sending positional information device, the request including a first identifier of the requesting positional information device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Pathfinder application installed in the mobile device (“requesting positional information device”) allows the dog trainer to access (“sending a request”) the location information of the dog sent by the GPS collar (“sending positional information device”) worn by the dog. Therefore, it would be apparent to a person having ordinary skill in the art that a request is sent from the mobile device to a server for retrieving the dog’s location data (“at least one address stored in at least one sending positional information device”).</p> <p>Further, the application displays an icon on a map indicating the location of the dog trainer along with the dog’s location. Therefore, it would be apparent to a person having ordinary skill in the art that the request includes the mobile device identification data such as the location information (“a first identifier of the requesting positional information device”).</p>
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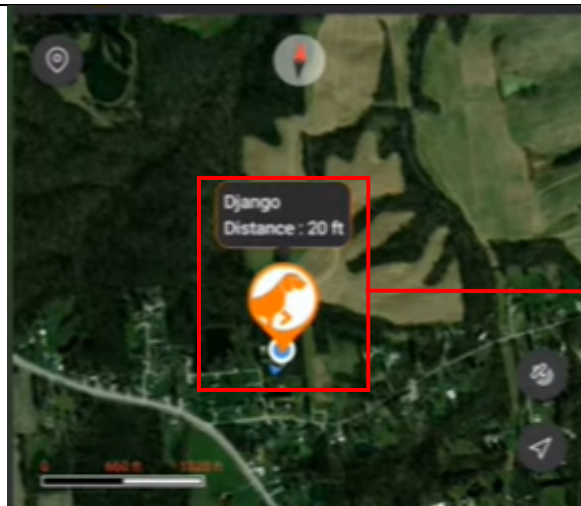
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sending a request
from a requesting
positional
information device

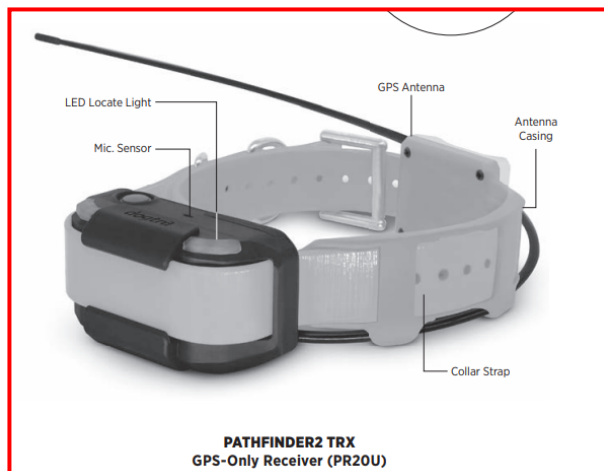
Source: <https://www.youtube.com/watch?v=XPaA0UGzWEE>, at 7:37 (annotated)

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at least one
address stored in at
least one sending
positional
information device

Source: <https://www.youtube.com/watch?v=XPaA0UGzWEE>, at 7:45 (annotated)



sending positional
information device

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Source:

https://www.dogtra.com/cache/DOC133_PATHFINDER2series_USA20230306REDUCED.pdf?20230308042711,
Page 6 (annotated)

4. KEY FEATURES OF PATHFINDER2 APP

4-1. MAP

Create Marker **3**

Map Selection **4**



2 Dog Position

1a My Position

1b My Position

Main menu tab

Indication of
first identifier

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	<p>Source: https://www.dogtra.com/cache/DOC133_PATHFINDER2series_USA20230306REDUCED.pdf?20230308042711, Page 10 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Company's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[1.2] receiving at the requesting positional information device, from the server, a retrieved at least one address to the requesting positional information device wherein the server</p>	<p>Company performs and induces others to perform the step of receiving at the requesting positional information device, from the server, a retrieved at least one address to the requesting positional information device wherein the server determines a second identifier for identifying the at least one sending positional information device based on the received first identifier and retrieves the requested at least one address stored in the identified at least one sending positional information device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Pathfinder application allows the dog trainer to view the location of the dog (“retrieved at least one address to the requesting positional information device”) displayed on the map. Therefore, it would be apparent to a person having ordinary skill in the art that the retrieved location data is received from the server.</p> <p>Further, the application allows the trainer to track multiple dogs wearing the GPS collars (“at least one sending positional information device”). When the application is paired with the GPS Connector which is further paired with the collars, a link is established between the collars and the application, such that the mobile device stores the identification information for different collars. Therefore, it would be apparent to a person having ordinary skill in the art that when the trainer accesses the location of a specific dog (“based on the received first identifier”), the server determines the identification information (“second identifier”) for identifying the specific GPS collar (“identifying the at least one</p>

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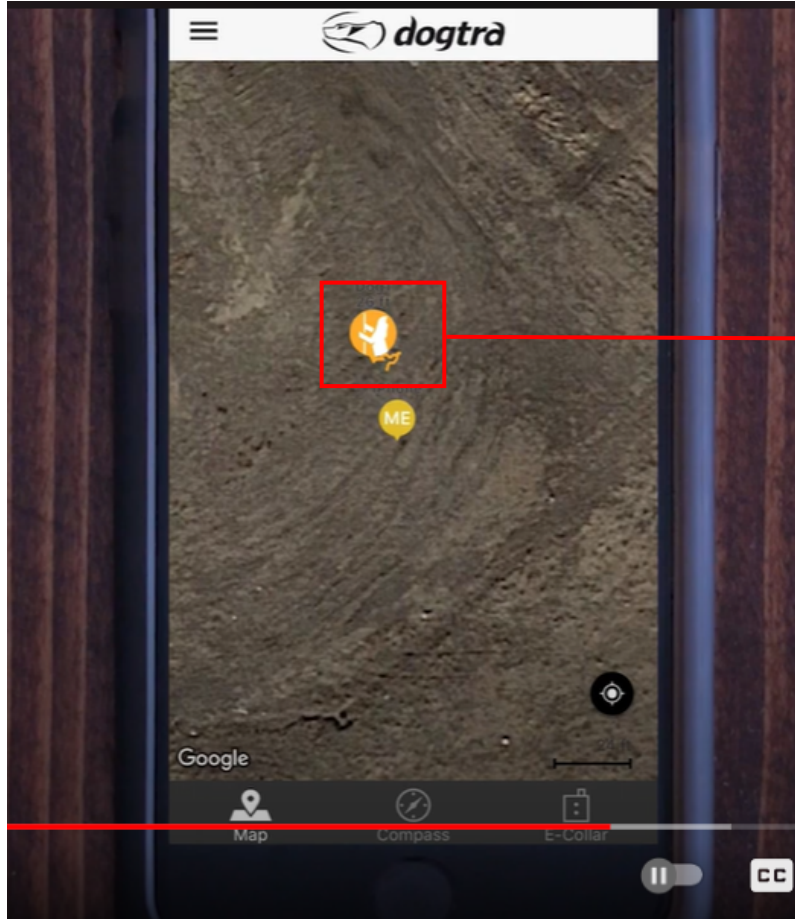
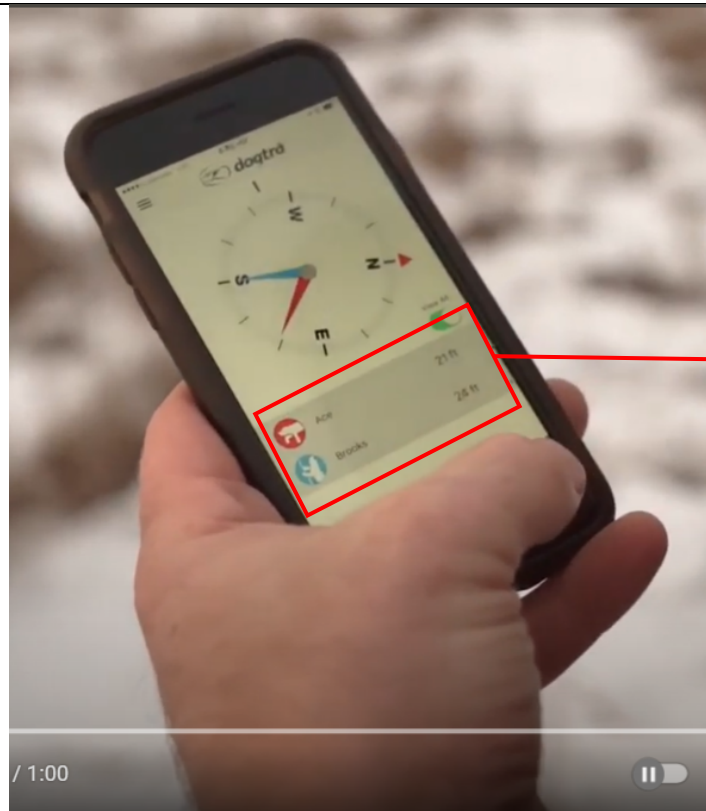
<p>determines a second identifier for identifying the at least one sending positional information device based on the received first identifier and retrieves the requested at least one address stored in the identified at least one sending positional information device.</p>	<p>sending positional information device”) and provides the relevant location data to be displayed on the map (“retrieves the requested at least one address stored in the identified at least one sending positional information device”).</p> <div data-bbox="407 347 1197 1261">  <p>The screenshot shows the Dogtra mobile application. At the top, there is a menu icon and the 'dogtra' logo. The main area is a satellite map. A yellow dog icon is positioned on the map, and a red rectangular box highlights it. Below the dog icon is a yellow circular label with the text 'ME'. A red line extends from the right side of the red box to the right, pointing towards the text 'retrieved at least one address to the requesting positional information device'. At the bottom of the screen, there is a navigation bar with icons for 'Map', 'Compass', and 'E-Collar', along with a pause button and a 'CC' icon.</p> </div> <p>retrieved at least one address to the requesting positional information device</p> <p>Source: https://www.youtube.com/watch?v=CpuTyeLsH8Q, at 2:46 (annotated)</p>
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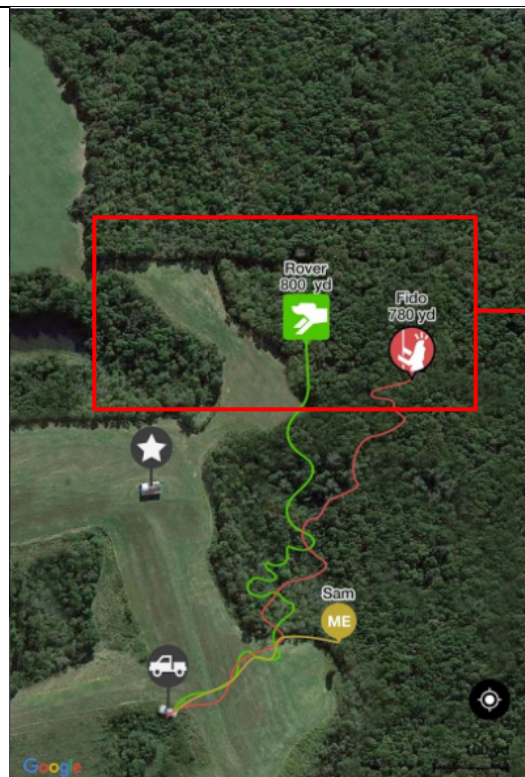
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Information regarding at least one sending positional information device

Source: <https://www.youtube.com/watch?v=N59OAxRY9eQ>, at 0:09 (annotated)

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identifying the at least one
sending positional
information device

Source: <https://play.google.com/store/apps/details?id=com.dogtra.gspathfinder&hl=en&gl=US> (annotated)

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2. List of References

1. https://www.dogtra.com/cache/DOC133_PATHFINDER2series_USA20230306REDUCED.pdf?20230308042711, last accessed on 09 April, 2024.
2. <https://www.youtube.com/watch?v=ITeiCmJf5Do>, last accessed on 09 April, 2024.
3. <https://www.youtube.com/watch?v=CpuTyeLsH8Q>, last accessed on 09 April, 2024.
4. <https://www.youtube.com/watch?v=XPaA0UGzWEE>, last accessed on 09 April, 2024.
5. <https://www.youtube.com/watch?v=N59OAxRY9eQ>, last accessed on 09 April, 2024.
6. <https://www.dogtra.com/products/tracking-and-training>, last accessed on 09 April, 2024.
7. <https://www.dogtra.com/products/dogtra-parts/pathfindertrx-additional-gpsonly-collar>, last accessed on 09 April, 2024.
8. <https://play.google.com/store/apps/details?id=com.dogtra.gspathfinder&hl=en&gl=US>, last accessed on 09 April, 2024.